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December 5, 2024

Via E-Mail

Milman Labuda Law Group PLLC  
Attn: Michael Mule, Esq.  
3000 Marcus Avenue  
Suite 3W8  
Lake Success, New York 11402

Re: *AutoExpo Ent., Inc., et al. v. Elyahou, et al.*  
Case No.: 23-cv-9249. Certified Defendants' Motion to Dismiss

Counsel:

On behalf of defendants Avi Eitan, Fifty Seven Consulting Corp. d/b/a Certified Auto Group a/k/a Certified Performance Motors and Fazeeda Kassim (collectively, the "Certified Defendants"), in the above-captioned action, we hereby enclose:

- i. the Certified Defendants' Notice of Motion for an order (i) dismissing the First, Second, Third, Fourth, Sixth, Thirteenth, Seventeenth and Eighteenth, Twentieth and Twenty First Causes of Action of the Amended Complaint, and, thereby, in the absence of a viable Federal claim, the Amended Complaint in its entirety as against the Certified Defendants, pursuant to Rule 12(b)(1) and (b)(6) of the Federal Rules of Civil Procedure, and (ii) granting the Certified Defendants such other and further relief as may be just, proper and equitable (the "Certified Defendants' Motion to Dismiss the Complaint"); and
- ii. The Certified Defendants Memorandum of Law in Support of their Motion To Dismiss the Amended Complaint, dated December 5, 2024; and
- iii. Declaration of Matthew Feinman dated December 5, 2024, together with a supporting Exhibit.

Sincerely,

/s/ Matthew Feinman  
Steven Cohn, Esq.  
Matthew Feinman